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*ATTORNEYS FOR AGTEXAS FARM CREDIT SERVICES,  
AGTEXAS, PCA AND  
THORLAKSON DIAMOND T FEEDERS, LP*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

<b>IN RE:</b>	§	
	§	
<b>MCCLAIN FEED YARD, INC., et al.,<sup>1</sup></b>	§	<b>CASE NO. 23-20084-RLJ-7</b>
	§	
	§	
<b>Debtors</b>	§	<b>Jointly Administered<sup>1</sup></b>

**AGTEXAS FARM CREDIT SERVICES, AG TEXAS PCA, AND  
THORLAKSON DIAMOND T FEEDERS, LP'S RESPONSE IN OPPOSITION TO  
TRUSTEE'S MOTION FOR APPROVAL OF COMPROMISE AND SETTLEMENT  
WITH MEAGAN B. GOAD, JED GOAD, KINSEY MORELAND, AND JOSH  
MORELAND**

TO THE HONORABLE ROBERT L. JONES, BANKRUPTCY JUDGE:

COMES NOW, AgTexas Farm Credit Services, AgTexas PCA ("AgTexas"), and Thorlakson Diamond T. Feeders, LP ("Thorlakson"), Creditors and parties in interest to the above-entitled Chapter 7 cases, and files this Response in Opposition to the Trustee's Motion For Approval Of Compromise and Settlement With Meagan B. Goad, Jed Goad, Kinsey Moreland, And Josh Moreland [Docket No. 147] (the "Motion for Approval"), and would respectfully show the Court as follows:

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<sup>1</sup> The Debtors in these chapter 7 cases are: McClain Feed Yard, Inc. (Case No. 23-20084-RLJ), McClain Farms, Inc. (Case No. 23-20085-RLJ), and 7M Cattle Feeders, Inc. (Case No. 23-20086-RLJ)

1. Thorlakson purchased thousands of cattle from McClain Feed Yard Inc. or 7M Cattle Feeders, Inc., during at least the one year period before the filing of these cases. These cattle were placed for feeding until they were ready for sale to a purchaser to place cattle in a finishing feedyard at one of the two locations operated by these Debtors in Texas. The cattle were held in these two locations in Texas for approximately 100 days before they were sold and delivered for placement in finishing feedyards.

2. All of the physical operations concerning these cattle after they were placed in the possession of the Debtor's occurred in Texas.

3. Following the news of the Debtor's financial difficulties, AgTexas and Thorlakson inspected the Debtors' locations in Texas, and found very few of their cattle.

4. AgTexas and Thorlakson have, through counsel, read the objections to the Motion for Approval. Although the objections filed by Rabo Agrifinance [Docket No. 153], and by the "Cattle Creditors" [Docket No. 154] refer in part to facts not in the possession of AgTexas or Thorlakson, the arguments made appear to be sound and are adopted by reference.

WHEREFORE, AgTexas and Thorlakson respectfully request that the Court deny the Motion for Approval.

DATED this 5th day of December, 2023.

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By: /s/ David L. LeBas  
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 5, 2023, the foregoing document was filed with the Clerk of the Court in each of the foregoing Chapter 7 cases using the CM/ECF system, which sent notice of electronic filing to all electronic filing users in each case.

/s/ David L. LeBas  
David L. LeBas